

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA

v.

AKSHAY RAM KANCHARLA,

Defendant.

UNDER SEAL

Case No. 1:22-mj-26

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Brian Cramer, being duly sworn, depose and state the following:

INTRODUCTION

1. This affidavit is submitted in support of a criminal complaint and arrest warrant charging the defendant, AKSHAY RAM KANCHARLA, with knowingly, intentionally, and unlawfully distributing a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly referred to as fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since October 2017. I am currently assigned to the Washington Field Office, Northern Virginia Resident Agency. I am on a squad that investigates darknet related narcotics trafficking and I have been assigned to this squad since November 2020. My first three years in the FBI, I was assigned to the Northern Virginia Violent Crimes Task Force. Prior to being hired as a Special Agent with the FBI, I was a Deputy Sheriff with the Hillsborough County Sheriff’s Office in Tampa, Florida and was so employed from March 2013 to April 2017. I have received formal training in the investigation of drug and violent crimes, including specialized training in

forensic evidence collection. I have investigated or assisted in the investigation of several cases involving violent criminal activity, narcotics and crimes against persons and property. I have been a sworn law enforcement officer during all times herein.

3. The facts and information contained in this affidavit are based upon my training and experience, participation in this and other investigations, personal knowledge, and observations during the course of this investigation, as well as the observations of other individuals involved in this investigation. All observations not personally made by me were relayed to me by the individuals who made them or were conveyed to me through my review of the records, documents, and other physical evidence obtained during the course of the investigation. This affidavit is meant to convey information necessary to support probable cause for the requested complaint and arrest warrant and is not intended to include each and every fact observed by me or known to the government. The inferences and conclusions I draw from the evidence included in this affidavit are what I believe based on my training, experience, and knowledge of the investigation.

PROBABLE CAUSE

A. The Investigation

4. The United States, including the FBI and the U.S. Postal Inspection Service (“USPIS”), is conducting a criminal investigation of a darknet market (“DM”) vendor that operates using the moniker “OnlyTheFinest” and the Wickr¹ account “farmgod1.” Since October 2021 the FBI has been conducting controlled purchases from OnlyTheFinest. Unless otherwise noted, controlled substances purchased have been submitted to a laboratory for testing and are pending analysis.

¹ Wickr is an end to end encrypted communications application accessed via mobile telephones and computers.

5. A DM is a hidden commercial website that operates on a portion of the Internet that is often referred to as the TOR network, darkweb, or darknet. A DM operates as a black market, selling or brokering transactions involving legal products as well as drugs, weapons, counterfeit currency, stolen credit card details, forged documents, unlicensed pharmaceuticals, steroids, and other illicit goods.

6. Individuals typically purchase narcotics through DMs from “vendors,” who accept digital currency such as Bitcoin² for payment. “Vendors” are the darknet’s sellers of goods and services, often of an illicit nature, and they do so through the creation and operation of “vendor accounts” on DMs. Customers, meanwhile, operate “customer accounts.” Vendor and customer accounts are not identified by numbers, but rather monikers or “handles,” much like the username one would use on a clear web site. If a moniker on a particular marketplace has not already been registered by another user, vendors and customers can use the same moniker across multiple marketplaces. Based on customer reviews, vendors can become well known as “trusted” vendors.

7. In October 2021, the FBI reviewed a vendor profile for OnlyTheFinest on a DM known as ToRReZ. The profile indicated that the account was created on August 25, 2021, and that the vendor had completed at least 92 sales at that time. The profile offered several listings for varying quantities of pressed³ Oxycodone pills, pressed Xanax bars, pressed Adderall pills,

² Bitcoin is a type of digital cryptocurrency. Functionally, it serves the same purpose as United States dollars, except that it is not tied to a central bank and is not regulated by a government body such as a treasury. Bitcoin transactions take place entirely online and offer a degree of anonymity to users. Bitcoin transactions are securely recorded in a public ledger called a blockchain. Based on my training and experience, individuals who are involved in criminal activity over the darkweb often purchase items in Bitcoin to conceal the true nature of the funds from law enforcement.

³ Pressed refers to counterfeit pills. Counterfeit pills are fake medications that have different ingredients than the actual medication. They may contain no active ingredient, the wrong active ingredient, or have the right ingredient but in an incorrect quantity. Counterfeit pills may contain lethal amounts of fentanyl and are extremely dangerous because they often appear identical to legitimate prescription pills, and the user is likely unaware of how lethal they can be.

and THC resin. The bulk of OnlyTheFinest sales are pressed Oxycodone pills. Within the product description for pressed Oxycodone pills, the pills were described as “THESE M30 BLUES ARE VERY POTENT! PLEASE START WITH A SMALL DOSAGE BEFORE WORKING YOUR WAY UP PLEASE! Even if you think your tolerance is high. These are smokable, snortable, injectable and everything in between.”

8. On October 7, 2021, an FBI employee operating in an undercover (“UC”) capacity accessed the ToRReZ market and ordered 10 pills from OnlyTheFinest. The UC provided an address in Northern Virginia, within the Eastern District of Virginia, where OnlyTheFinest could send the pills and the UC paid for the pills with Bitcoin. Several days later, law enforcement retrieved a USPS Priority Mail envelope at the address designated by the UC. The return address on the envelope was an address in Tampa, Florida and had a business name of “SKIN NUTRIENTS & ESSENTIALS, LLC.” The envelope was opened, and the following was contained within: a yellow envelope, a white envelope, and a “THANK YOU” card. I know that darknet drug vendors often place additional items in the USPS packaging with the drugs in an attempt to avoid detection by USPS and/or law enforcement personnel. Within the thank you card was a zip lock bag wrapped in duct tape. Inside the zip lock bag was 10 light blue pills. The pills had “M” stamped on one side and “30” on the other. Pharmaceutical grade Oxycodone pills are embossed with “M” on one side and “30” on the other; the “30” indicates 30 mg. This is commonly referred to as “stealth.” The pills were sent to the DEA Mid-Atlantic Laboratory and tested positive for fentanyl and weighed 1.07 grams.

9. USPIS reviewed USPS business records for the tracking number of the envelope sent to the FBI as part of the October 7, 2021, UC purchase. The records indicated that the tracking number was tracked by an Internet Protocol (“IP”) address located in Tampa, Florida.

USPS records also indicated that the same IP address tracked packages coming from Phoenix, Arizona. The packages from Arizona were mailed to a residence on the 16000 block of Colchester Palms Drive in Tampa, Florida associated with the defendant AKSHAY RAM KANCHARLA, referred to hereinafter as the “KANCHARLA RESIDENCE.”

10. On October 21, 2021, an FBI UC accessed the ToRReZ market and ordered 50 pills from OnlyTheFinest. The UC provided an address in Northern Virginia, within the Eastern District of Virginia, where OnlyTheFinest could send the pills and the UC paid for the pills with Bitcoin. Several days later, law enforcement retrieved a USPS Priority Mail envelope at the address designated by the UC. The return address on the envelope was the same address as the previous UC deal and had the same business name of “SKIN NUTRIENTS & ESSENTIALS, LLC.” The envelope was opened, and the following was contained within: a white envelope, a small card wrapped in blue painters tape, within the small card was aluminum foil which contained a zip lock bag wrapped in more blue painters tape. Inside the zip lock bag were 50 light blue pills. The pills had “M” stamped on one side and “30” on the other. The pills were sent to the DEA Mid-Atlantic Laboratory and tested positive for fentanyl and weighed 5.365 grams.

11. On October 22, 2021, investigators obtained records from Coinbase⁴ for subscriber information for any accounts associated with the KANCHARLA RESIDENCE. The records indicated that two accounts were associated with the address and both accounts were registered to the defendant at his residence.

⁴ Coinbase is a secure online platform for buying, selling, transferring, and storing cryptocurrency.

12. As part of “know your customer” requirements from Coinbase, KANCHARLA was required to submit a photo of himself and a photo of his driver’s license. I compared the photo that KANCHARLA sent to Coinbase and a photo from KANCHARLA’s driver’s license and confirmed it is the same person.

13. On October 30, 2021, an FBI UC accessed the ToRReZ market and sent a message to OnlyTheFinest asking if they would like to conduct a direct deal off of the DM. The message was sent encrypted using OnlyTheFinest’s Pretty Good Privacy⁵ (“PGP”) Public Key. The UC provided a username to OnlyTheFinest where the UC could be contacted directly on Wickr. That same day the UC received a message on the Wickr account provided to OnlyTheFinest, the message was sent from username: farmgod1 and read, “hello there, onlythefinest here!”

14. That same day within the same chat, the UC placed an order on Wickr with farmgod1 for 50 pressed Oxycodone pills and 20 Adderall pills. Farmgod1 provided a Bitcoin address to the UC and the UC then deposited the Bitcoin for the payment. The UC provided an address in Northern Virginia, within the Eastern District of Virginia, where farmgod1 could send the pills. Several days later, law enforcement retrieved a USPS Priority Mail envelope at the address designated by the UC. The return address on the envelope was an address in Tampa, Florida and had the same business name of “SKIN NUTRIENTS & ESSENTIALS, LLC.” The

⁵ PGP is used on dark web markets to encrypt communications between vendors and customers. When a customer orders from a vendor or sends a vendor a message on a dark web market, that information may be stored in the marketplace’s database. Given concerns that the marketplace server may be hacked or seized by law enforcement, vendors and customers often communicate via PGP encrypted means to address this security problem. A vendor has both a PGP private key and a public key. A customer can use the vendor’s public key to encrypt a message. The vendor then uses the private key to decrypt the message. Vendors keep their private key secure but not their public key, which they put on their profile. This is done so customers may use a vendor’s PGP public key to encrypt data sent to the vendor, such as the customer’s name and address. Only the corresponding PGP private key, held by the vendor, can decrypt the data.

envelope was opened, and the following was contained within: a yellow envelope, a white envelope, a small card wrapped in blue painters tape, within the small card was aluminum foil which contained two zip lock bags wrapped in more blue painters tape. Inside one zip lock bag were 50 light blue pills and the other zip lock bag contained 20 orange pills. The light blue pills had "M" stamped on one side and "30" on the other. The orange pills had "30" stamped on one side and "b 974" on the other. Pharmaceutical grade "b 974" pills are embossed with "30" on one side and "b 974" on the other; the "30" indicates 30 mg and "b 974" indicates the national drug code. "b 974" pills are the generic version of Adderall. The pills were sent to the DEA Mid-Atlantic Laboratory and test results are pending.

15. When law enforcement conducts investigations involving virtual currency, they sometimes use commercial services offered by several different blockchain-analysis companies. These companies analyze the Bitcoin blockchain and attempt to identify the individuals or groups involved in transactions. Specifically, these companies have developed proprietary software that analyzes all the data underlying each Bitcoin transaction on the Bitcoin blockchain and then groups related Bitcoin transactions into "clusters" based on that analysis. The methods employed by these blockchain analysis companies have been independently validated by computer scientists, who have shown that these "clustering" techniques provide accurate results. Additionally, through numerous, unrelated investigations, law enforcement has been able to corroborate the accuracy of the information provided via these third-party services.

16. The third-party blockchain-analysis software utilized in the instant case is an anti-money laundering software used by financial institutions and law enforcement organizations worldwide. This third-party blockchain analysis software has supported many investigations and

has been the basis for numerous search and seizure warrants. Analysis of the Bitcoin address provided by farmgod1 for payment in connection with the October 30, 2021, controlled purchase revealed that the Bitcoin address was associated with Square. Investigators obtained records from Square which indicated the account was registered to KANCHARLA.

17. On November 3, 2021, law enforcement conducted surveillance at the KANCHARLA RESIDENCE. KANCHARLA was observed leaving the residence in a white Nissan 350Z, Florida license plate: LQQ***. Department of Motor Vehicle records indicate that the vehicle is registered to KANCHARLA. KANCHARLA was followed directly to a United Parcel Service (“UPS”) store located at 16057 Tampa Palms Blvd. in Tampa, Florida. He was seen walking into the UPS store carrying approximately five packages. A few minutes after KANCHARLA left the UPS store, law enforcement met with a UPS store employee, referred to hereinafter as, “EMPLOYEE 1.” Law enforcement requested to see any packages that contained the sender’s name of AKSHAY KANCHARLA or “SKIN NUTRIENTS & ESSENTIALS LLC.” EMPLOYEE 1 showed law enforcement six packages that all contained the sender’s name of “SKIN NUTRIENTS & ESSENTIALS LLC”—the same sender as all of the controlled purchases received from OnlyTheFinest. Four of the six packages were sealed UPS envelopes. One package was a light blue sealed envelope. One package, which was the package being sent as a result of the FBI UC purchase, was a sealed USPS Priority Mail envelope. EMPLOYEE 1 was the employee who processed all the transactions for KANCHARALA while he was inside the store. All six packages were given back to EMPLOYEE 1 to be mailed.

18. On November 8, 2021, a UC placed an order on Wickr with farmgod1 for 200 pressed Oxycodone pills. Farmgod1 provided a Bitcoin address to the UC and the UC then deposited the Bitcoin for the payment. The UC provided an address in Northern Virginia, within

the Eastern District of Virginia, where farmgod1 could send the pills. Several days later, law enforcement retrieved a UPS envelope at the address designated by the UC. The return address on the envelope was an address in Tampa, Florida and had the same business name of “SKIN NUTRIENTS & ESSENTIALS, LLC.” The envelope was opened, and the following was contained within: a yellow envelope, aluminum foil, and a zip lock bag that was wrapped in yellow painters tape. Within the zip lock bag were several light blue pills. The light blue pills had “M” stamped on one side and “30” on the other. The pills were sent to the DEA Mid-Atlantic Laboratory and test results are pending.

19. On November 30, 2021, a UC placed an order on Wickr with farmgod1 for 200 pressed Oxycodone pills. Farmgod1 provided a Bitcoin address to the UC and the UC then deposited the Bitcoin for the payment. The Bitcoin address was different than the previous address. The UC provided an address in Northern Virginia, within the Eastern District of Virginia, where farmgod1 could send the pills. Several days later, law enforcement retrieved a UPS envelope at the address designated by the UC. The return address on the envelope was an address in Tampa, Florida and had the same business name of “SKIN NUTRIENTS & ESSENTIALS, LLC.” The envelope was opened, and the following was contained within: a yellow envelope, aluminum foil, and a zip lock bag that was wrapped in yellow painters tape. Within the zip lock bag were several light blue pills. The light blue pills had “M” stamped on one side and “30” on the other. The pills were sent to the DEA Mid-Atlantic Laboratory and test results are pending.

20. On December 15, 2021, a UC placed an order on Wickr with farmgod1 for 200 pressed Oxycodone pills. Farmgod1 provided a Bitcoin address to the UC and the UC then deposited the Bitcoin for the payment. The UC provided an address in Northern Virginia, within the Eastern District of Virginia, where farmgod1 could send the pills.

21. On December 16, 2021, law enforcement conducted surveillance at the KANCHARLA RESIDENCE. KANCHARLA was observed leaving the residence in a white Nissan 350Z, Florida license plate: LQQ***. KANCHARLA was followed to the same United Parcel Service (“UPS”) store located at 16057 Tampa Palms Blvd., Tampa, Florida. He was seen walking into the UPS store carrying several yellow envelopes within a clear bag. After KANCHARLA left the UPS store, law enforcement met with the same UPS store employee, EMPLOYEE 1. Law enforcement requested to see any packages that contained the sender’s name of AKSHAY KANCHARLA or “SKIN NUTRIENTS & ESSENTIALS LLC.” EMPLOYEE 1 showed law enforcement six packages that all contained the sender’s name of “SKIN NUTRIENTS & ESSENTIALS LLC.” One of the six packages that was shown to law enforcement was addressed to the name provided by the UC for the 200 pills ordered the previous day. All six packages were given back to EMPLOYEE 1 to be mailed.

22. On December 21, 2021, law enforcement retrieved a USPS envelope at the address designated by the UC. The tracking number listed on the package matched the tracking number for the package that law enforcement saw at the UPS store on December 16, 2021. The return address on the envelope was an address in Tampa, Florida and had the same business name of “SKIN NUTRIENTS & ESSENTIALS, LLC.” The envelope was opened, and the following was contained within: a yellow envelope, aluminum foil, and a zip lock bag that was wrapped in yellow painters tape. Within the zip lock bag were several light blue pills. The light blue pills had “M” stamped on one side and “30” on the other. The pills were sent to the DEA Mid-Atlantic Laboratory and test results are pending.

23. On December 16, 2021, the administrator operating the DM ToRReZ posted that the market was going to close on December 17, 2021. A market review of OnlyTheFinest was

conducted by investigators on December 16 and December 21, 2021. The review revealed that OnlyTheFinest had completed at least 264 transactions and received 152 reviews. OnlyTheFinest updated their profile to inform customers that they would be operating on the DM Dark0de Reborn and that they could be contacted on Wickr under the moniker farmgod1.

24. On January 27, 2022, investigators conducted a DM review on Dark0de Reborn for vendor profile OnlyTheFinest. OnlyTheFinest had completed 73 transactions and received 26 reviews. Investigators compared the PGP listed by OnlyTheFinest on Dark0de Reborn with the PGP listed on ToRReZ which revealed they were the same.

CONCLUSION

25. Based on the facts set forth above, I respectfully submit there is probable cause to believe that, from at least in or about August 2021 up to and including February 2022, in the Eastern District of Virginia and elsewhere, the defendant AKSHAY RAM KANCHARLA, knowingly, intentionally, and unlawfully distributed a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly referred to as fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).



Brian Cramer
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to in accordance with Fed. R. Crim. P. 4.1
by telephone on February 16, 2022.

The Honorable Theresa Carroll Buchanan
United States Magistrate Judge